UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

RALPH A. VANZANT, et al.

CASE NO. 1:04cv484

Plaintiffs

Judge Barrett

-VS-

DAIMLER CHRYSLER CORPORATION,

Defendant.

OPINION AND ORDER

Defendant, Daimler Chrysler Corporation, has moved for summary judgment (Doc. 47) on Plaintiffs' complaint. Plaintiff filed a memorandum in opposition (Doc. 49) and Defendant replied (Doc. 52).

I. BACKGROUND INFORMATION AND FACTS

Plaintiffs' complaint alleges negligence (Count I); strict products liability defect in design and/or manufacture (Count II); strict liability - failure to warn (Count III); breach of expressed warranty (Count IV); breach of implied warranty (Count V); punitive damages (Count VI); and loss of consortium (Count VII). Plaintiffs indicate in their memorandum in opposition that they are withdrawing their manufacturing defect claim (part of Count II) as well as Counts III and IV.

A. The Accident.

On February 18, 2002 at approximately 8:55 A.M., Plaintiff, Ralph Vanzant and his friend, David Cornelius, were traveling in a 1998 Dodge Ram 1500 pick-up truck (hereinafter "Dodge Ram") in a southeast direction on State Route 73 in Highland County,

Ohio. (Police Report attached as Exhibit 1 to Doc. 47). Mr. Cornelius was driving with Mr. Vanzant riding in the front passenger seat. As they approached the intersection of State Route 73 and Prospect Road, traveling at approximately 50 miles an hour, a 1985 Chevy pick-up truck, traveling westbound on Prospect Road attempted to cross State Route 73 in front of them, resulting in a collision between the Chevy and the Dodge Ram. (Doc. 47, Exhibit 1).

According to Plaintiffs, at the time of impact the Dodge Ram was traveling 32 to 33 mph and the offending Chevy pick-up truck was traveling 11 to 12 mph. The impact between the vehicles slowed the speed of the Dodge Ram by 11 ½ mph. (Doc. 49, Exhibit 1, Aerni Depo., Pgs. 172-173)¹. The Chevy continued to travel across the intersection and struck a third vehicle before stopping. The driver of the Chevy pick-up truck was at fault and was cited for failure to yield causing the accident. (Doc. 47, Exhibit 1).

Plaintiff Ralph Vanzant was not wearing a seatbelt and sustained a cervical spine injury while his passenger, David Cornelius, who was likewise not wearing a seatbelt did not require any medical treatment. (Cornelius Depo. Pg. 69; Vanzant Depo. Pg. 49-50; Doc. 47, Exhibit 1). Mr. Vanzant had to be cut out of the vehicle and was heli-lifted to Miami Valley Hospital for treatment. (Doc. 47, Exhibit 4). At the time of the accident, Plaintiff was approximately 6' tall and weighed 260 pounds. (Vanzant Depo., Pgs. 95-96). Also at the time of the accident, Mr. Vanzant apparently suffered from an undiagnosed spinal stenosis. (Benedict Depo., Pg. 90; Pirnat Depo., Pg. 47). As a result of the accident, Plaintiff

¹Only deposition excerpts were filed in this matter as exhibits to the pleadings. The remaining references will be to just the deposition transcript without reference to the document number and exhibit number that the excerpt is attached to.

sustained an injury to his cervical cord rendering Plaintiff a quadriplegic. (Benedict Depo., Pg. 63; Pirnat Depo., Pg. 13).

B. The Airbag.

The passenger side airbag of a Dodge 1998 Ram truck is a mid-mount design which means that its deployment doors are located on a portion of the instrument panel facing the occupant rather than on top of the instrument panel facing the windshield. (Doc. 47, Exhibit 10 at 1). Defendants have attached photographic test results on airbag deployment using an unbelted dummy in the 95th percentile (i.e., a similar size to that of Plaintiff) with the passenger moved six inches forward in the seat. (Doc. 47, Exhibit 21). These deployment photographs show the airbag strike the dummy's lower torso first and, in the pictures provided, does not reach the dummy's forehead. From an analysis of the deployment airbag and observation of films, Defendant's expert opined that the airbag in question comes virtually straight out horizontally towards the passenger's chest. (Brantman Depo., Pg. 83). The full pattern of the airbag is designed to deploy downward if there is an object, like an out of position unbelted passenger, blocking the bag. (Id. at 214). A mid-mount airbag can usually use a lower pressure inflator and have a smaller bag volume to work with. According to Defense experts, very little of the bag will get up into the neck area from the mid-mount. The inflator in the 1998 Dodge Ram is a hybrid inflator which is a combination of stored gas and a pyrotechnic generator that heats up the gas which results in one of the lowest power inflators that Brantman has seen. (Id. at 141).

II. ARGUMENTS

The Plaintiffs' argue that Ralph Vanzant's head came into contact with the airbag, specifically, the leading edge of the airbag, during the accident thus causing the injury.

Plaintiffs argue that the airbag was too forceful and that Chrysler's design is lacking as it ignores the issue of foreseeable misuse wherein approximately 40% of passengers in pick-up trucks are unbelted. Plaintiffs contend that the Defendant did not adequately test for pre-impact breaking on unbelted passengers.

Defendant counters that Plaintiff's primary initial theory, that the airbag was too powerful, is not sustainable based upon the evidence presented. They further assert the expert opinions and testimony submitted by the Plaintiffs have no foundation in the factual record and, in fact, is contradicted by it.

III. LEGAL ANALYSIS

Summary judgment is appropriate "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law." Fed.R.Civ.P. 56(c). A court must view the evidence and draw all reasonable inferences in favor of the nonmoving party. See Matsushita Elec. Indus. Co. v. Zenith Radio Corp., 475 U.S. 574, 587, (1986). The moving party bears the initial burden of showing the absence of a genuine issue of material fact, but then the nonmoving party must come forward with specific facts showing that there is a genuine issue for trial. Celotex Corp. v. Catrett, 477 U.S. 317 (1986); Matsushita, 475 U.S. at 587. However, the nonmoving party may not rest on the mere allegations in the pleadings. Fed.R.Civ.P. 56(e); Celotex, 477 U.S. at 324. Summary judgment is proper "if the pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law." Fed.R.Civ.P. 56(c); Celotex

Corp. v. Catrett, supra at 322. Once the movant has met this initial burden, the non-movant cannot rest on its pleadings, but must show that there is a genuine issue for trial. *Id.* at 324. "By its very terms, this standard provides that the mere existence of some alleged factual dispute between the parties will not defeat an otherwise properly supported motion for summary judgment; the requirement is that there be no *genuine* issue of material fact." Anderson v. Liberty Lobby, Inc. 477 U.S. 242, 247-48 (1986)(emphasis original). Thus, the Supreme Court has stated that "[t]he mere existence of a scintilla of evidence in support of the [non-moving party's] position will be insufficient; there must be evidence on which the jury could reasonably find for the [non-moving party]" Id. at 252. Consequently, if the evidence presented by the non-moving party is not significantly probative, summary judgment is properly granted. Id. at 249-250.

Defendant has also filed a separate motion to strike the Affidavit of Byron Bloch (Doc. 53) which has been granted, in part, and denied, in part. Defendant's motion regarding Bloch deals with the admissibility of certain portions of his Affidavit submitted by Plaintiff in response to Defendants' Motion for Summary Judgment. "The issue of the admissibility of an expert's [testimony] is distinct from the issue of whether the [testimony] is sufficient to withstand a summary judgment motion" and requires separate inquiries regarding the admissibility of the experts' affidavit and the sufficiency of the affidavit to withstand summary judgment. *Monks v. General Electric Co.*, 919 F.2d 1189, 1192-93 (6th Cir. 1990). Federal Rule of Evidence 703 states, in part, that

the facts or data in a particular case upon which an expert bases an opinion or inference may be those perceived by or made known to the expert at or before the hearing. If of a type reasonably relied upon by experts in the particular field in forming opinions or inferences upon the subject, the facts or data need not be admissible in evidence. . .

However, where the record taken as a whole cannot lead a rational trier of fact to find for the non-moving party, there is no genuine issue for trial. *Monks, supra*. A party may not create a factual issue by filing an affidavit after a motion for summary judgment has been filed which contradicts his earlier deposition testimony. If a party who has been examined at length on deposition could raise an issue of fact simply by submitting an affidavit contradicting his own prior testimony, this would greatly diminish the utility of summary judgment as a procedure for screening out sham issues of fact. *Reid, et al. v. Sears Roebuck & Company*, 790 F.2d 453 (6th Cir. 1986). Numerous courts have held that Rule 56 does not "make summary judgment impossible whenever a party has produced an expert to support its position." *Merit Motors v. Chrysler Corp., et al.*, 569 F.2d 666, 673 (D.C. Cir. 1977).

Defendant states that "[t]he nub of [its] motion is whether summary judgment is proper when the non-movant submits expert testimony that has no foundation in - and indeed is contradicted by - the factual record in the case." (Doc. 47, Pg. 7).

A. Strict Products Liability Defect in Design.

The law on products liability is codified in Ohio Revised Code Chapter 2307 which states that "a manufacturer is subject to liability for compensatory damages based on a product liability claim only if the claimant establishes, by a preponderance of the evidence, both of the following: (1)... the product in question was ...defective in design or formulation as described in 2307.75 of the Revised Code...; [and] (2) A defective aspect of the product in question ... was a proximate cause of harm for which the claimant seeks to recover

compensatory damages." O.R.C. §2307.73.

Ohio Revised Code Section 2307.75² provides, in relevant part, the following:

- (A) Subject to divisions ... (F) of this section, a product is defective in design or formulation if either of the following applies:
- (1) When it left the control of its manufacturer, the foreseeable risks associated with its design or formulation as determined pursuant to division (B) of this section exceeded the benefits associated with that design or formulation as determined pursuant to division (C) of this section;
- (2) It is more dangerous than an ordinary consumer would expect when used in an intended or reasonably foreseeable manner.
- (B) The foreseeable risks associated with the design or formulation of a product shall be determined by considering factors including, but not limited to, the following:
- (1) The nature and magnitude of the risks of harm associated with that design or formulation in light of the intended and reasonably foreseeable uses, modifications, or alterations of the product;
- (2) The likely awareness of product users, whether based on warnings, general knowledge, or otherwise, of those risks of harm;
- (3) The likelihood that that design or formulation would cause harm in light of the intended and reasonably foreseeable uses, modifications, or alterations of the product;
- (4) The extent to which that design or formulation conformed to any applicable public or private product standard that was in effect when the product left the control of its manufacturer.
- (C) The benefits associated with the design or formulation of a product shall be determined by considering factors including, but not limited to, the following:
- (1) The intended or actual utility of the product, including any performance

²Ohio Revised Code Section 2307.75 was amended by 150 v S 80, § 1, eff. 4-7-05. Since this case was filed in 2004 the 2001 version of the statute is applicable since Congress did not speak to retroactivity and because substantive changes were made. It is noted, however, that the motion for summary judgment was filed after the revised version became effective.

or safety advantages associated with that design or formulation;

- (2) The technical and economic feasibility, when the product left the control of its manufacturer, of using an alternative design or formulation;
- (3) The nature and magnitude of any foreseeable risks associated with such an alternative design or formulation.

Product defects may be proven by direct or circumstantial evidence. Where direct evidence is unavailable, a defect in a manufactured product existing at the time the product left the manufacturer may be proven by circumstantial evidence or other competent evidence where a preponderance of that evidence establishes that the product was defective in design or formulation. O.R.C. §2307.73(B).

1. Feasible Alternative Design.

The risk-benefit test stated above is subject to O.R.C. §2307.75(F) which states that "A product is not defective in design or formulation if, at the time the product left the control of its manufacturer, a practical and technically feasible alternative design or formulation was not available that would have prevented the harm for which the claimant seeks to recover compensatory damages without substantially impairing the usefulness or intended purpose of the product, unless the manufacturer acted unreasonably in introducing the product into trade or commerce."

The Court must first consider O.R.C. 2307.75(F) to determine if a practical and technically feasible alternative design was available for the 1998 Dodge Ram.³ "The subsection does not state whether the plaintiff or defendant bears the burden of production of an alternative design." *McGrath v. General Motors Corporation*, 26 Fed. Appx. 506 (6th

³It is undisputed that the defect in the airbag, if any, existed at the time it left the control of DaimlerChrysler.

Cir. 2002, unpublished). However, case law has determined that plaintiffs bear the burden of production. *See McGrath, supra; Jacobs v. E.I. du Pont de Nemours & Co.,* 67 F.3d 1219, 1242 (6th Cir. 1995).

Plaintiffs, through their expert, Byron Bloch, argue that there are several practical and technically feasible alternative designs for the airbag that were available. First, Mr. Bloch opines that had the airbag had a dual-stage or sequential inflator that the airbag would have inflated less forcefully and not injured Mr. Vanzant in such a devastating manner. (Doc. 52, Exhibit 1, Pgs. 3-4). Defendants argue that this opinion is based on the fact that Mr. Bloch thinks the airbag was too forceful for the moderate severity of the collision (Id. at 4) and that this opinion is not supported by the evidence as it has been shown that the airbag was, in fact, not too forceful.

Mr. Bloch opines that a peak pressure of 250 to 300 pounds to the occupant would be his preference for the vehicle and that he did not know the actual force with which the airbag in question actually deployed. Dr. Allen estimated the force of the airbag at 500 pounds but conceded that he did not know the mass of the 1998 Dodge passenger airbag (Allen Depo., Pg. 28, 78). He further conceded that his calculation of force is "certainly not applicable to the specifics of the Dodge Ram" as he based his calculation on a generic 1992 powered airbag (Allen Depo., Pgs. 184-86. See also Pgs. 28-29). In making his assumptions, Dr. Allen based the overall mass of the airbag at 5.5 pounds. (Allen Depo. Pg. 79-80). Dr. Brantman indicated the mass of the passenger side airbag for the Dodge Ram was only 1.39 pounds, significantly less than the 5.5 pounds assumed by Dr. Allen. (Brantman Depo. Pg. 208)(See also Doc. 47, Exhibit 18). Thus, he concluded, since force equals mass times acceleration and the mass is four times lower than assumed by Dr.

Allen, then the force will be four times lower as well. So based on the formula Dr. Allen used, his calculation of 500 pounds would now be four times lower, which would be 125 pounds and well below the acceptable range of 250-300 pounds preferred by Mr. Bloch. (Id. at 208-209). Therefore, the alternative of using multiple or sequential inflation pressures to make the airbag deploy with less force is not a viable alternative since it has been shown that the air was, in fact, well below the acceptable range of Plaintiff's expert.

Next, Mr. Bloch opines that the Defendant should have utilized tethers and airbag folding patterns to help shape the bag and reduce the distance that the airbag inflates from its stowed position. (Doc. 52, Exhibit 1, Pg. 4). Mr. Bloch asserts that untethered airbags can generate a force of 2,000 pounds and can deploy up to 20 to 25 inches from the instrument panel compared to tethered bags which only deploy 14 to 18 inches from the instrument panel. However, it has been shown that the specific airbag at issue in this accident only generated 125 pounds of force and Mr. Bloch failed to state how far *this* airbag deployed. Additionally, Defendant, in its reply brief, counters that the tethers add additional mass to the airbag creating a greater force and becoming more dangerous to passengers. Thus, Plaintiffs have not shown sufficient proof that the use of tethers is a feasible alternative design.

Mr. Bloch also opines that the folding patterns can affect how the airbag unfolds which can lead to an increased potential for a hyper-extension type injury as the torso proceeds into the inflating bag while the head is simultaneously forced rearward. (Doc. 52, Exhibit 1, Pg. 4). Although the Defendant does not address the issue of folding patterns, Plaintiffs have failed to show what folding pattern was used in the 1998 Dodge Ram truck and failed to prove what specific alternative folding pattern would have been better.

Finally, Mr. Bloch opines that a "top-mount" design for the airbag is preferable to the mid-mount design that is used on the 1998 Dodge Ram because the initial inflation pressure of a top-mounted design is directed upwards toward the windshield as opposed to the mid-mount that directs the pressure horizontally towards the passenger. (Doc. 52, Exhibit 1, Pg. 4). Mr. Bloch states "the force of such a horizontally inflating airbag... can cause severe injuries." (Id.) Thus, Mr. Bloch opines that the mid-mount on the 1998 Dodge Ram pickup truck has an inflation path that "is mostly horizontal, directly toward the seated passenger, Ralph Vanzant. (Id.). Defendant again asserts that since it has been shown that the force generated by this airbag is less than the acceptable range of force preferred by Mr. Bloch that this theory is not support by the evidence. The Court disagrees. Mr. Bloch is of the opinion that a top-mount distributes the pressure differently than a mid-mount, more vertically to be precise. The horizontal pressure, even of this depowered airbag, may, in fact, still be greater than that of a top-mount. Furthermore, although it is hotly disputed as to what Mr. Vanzant hit his head on or what hit him, it is undisputed that he did, in deed, hit his head on something or that something hit his head and caused his severe injury. Thus, the Court finds that Plaintiffs have sufficiently proved, to survive this motion, that a top-mounted airbag may be a practical and technically feasible alternative design that would have prevented the injures for which Plaintiffs are seeking to recover without substantially impairing the usefulness or intended purpose of the airbag.

2. Risk v. Benefits

The Court must next consider if the foreseeable risks associated with the design of the airbag exceed the benefits. As set forth above, there are several factors to be considered. See O.R.C. §2307.75(B) and (C). Unfortunately, the briefs submitted by the parties do not specifically address these factors. Instead, Plaintiffs allege that the Defendant did not adequately test for "foreseeable misuse" - that 40% of drivers and passengers do not wear seatbelts. However, this alone does not show how the foreseeable risks exceed the benefits. Thus, Plaintiffs have failed to prove that there is a genuine issue of fact on this issue.

3. Consumer Expectation

A product is defective under Ohio law if it is more dangerous than an ordinary consumer would expect. O.R.C. §2307.75(A)(2). Moreover, "the determination of whether a product is more dangerous than an ordinary person would expect is generally a question of fact which does not require expert testimony." *Hisrich v. Volvo Cars of N. Am., Inc.*, 226 F.3d 445, 455 (6th Cir. 2000) (citing Fisher v. Ford Motor Co., 13 F. Supp. 2d 631, 638 n.10 (N.D. Ohio 1998). However, there is no evidence in the record to indicate what an ordinary consumer would expect from an airbag during this type of accident. The only testimony relative to customer expectation is that from Plaintiff's expert. Mr. Bloch states that "airbags were designed and tested to offer adequate protection in frontal collisions for both the unbelted and belted drivers and passengers." (Exhibit 52, Exhibit 1, Pg. 2 (emphasis added)). This statement, however, is not sufficient to survive summary judgment. Furthermore, Mr. Vanzant did testify that he was aware of the seatbelt warning that says "death or serious injury can occur." (Vanzant Depo. Pg. 78).

4. Proximate Cause

Based upon the above decisions of this Court, the Court need not consider proximate cause. However, if Plaintiffs had established the risk-benefit theory of design

defect or the consumer-expectation standard above, the question of proximate cause would be one for a jury.

Mr. Vanzant suffered a hyperextension injury. This type of injury can be caused by the body moving forward and the head moving back or the head being abruptly stopped as the body continues to move forward. (Pirnat Depo., Pg 13). Plaintiff's expert, Dr. Pirnat concluded that based upon his review of the medical charts and the emergency room doctor's report that Mr. Vanzant was hit in the forehead by the airbag (Pirnat Depo., Pg. 37). Dr. Pirnat's statement is consistent with Mr. Vanzant's own testimony wherein he stated that he was hit in the head and face. (Vanzant Depo., Pgs. 97, 118).

Defendant's experts opine to the contrary. Dr. Brantman states that there is no position in which Mr. Vanzant could have been seated that would bring his head down to a level where an airbag could cause a forehead injury without totally abrading his face. (Brantman Depo., Pg. 61). More stridently he says, "you could not get an isolated abrasion on the forehead in any type of out of position scenario I'm looking at from that airbag. You would have to have associated other injuries, particularly abrasions, that would have occurred." (Id.). Dr. Benedict further indicates that the abrasions on the left side Mr. Vanzant's forehead could have been caused by the header or the sun visor. (Benedict Depo., Pgs. 62-63).

The record on this issue is muddy to say the least. Plaintiffs experts as well as Mr. Vanzant have all stated that the airbag hit Plaintiff's head causing his injuries. However, in response to questions posed by Defendant at their depositions, Dr. Pirnat and Dr. Allen seem to waiver on their opinions. Dr. Pirnat stated that it is possible that he could have received a hyperextension injury from striking the headliner, "A" pillar, or the windshield or

that he could have received these injuries in spite of the airbag. (Id. at 30). Dr. Allen stated that Mr. Vanzant could have received his injuries from striking the headliner. (Allen Depo. Pgs 65). Mr. Bloch states that his opinion is based on the review of Dr. Pirnat's deposition and the report of Dr. Allen. Mr. Vanzant testified that the airbag hit him "mostly in my head." However, when pressed further as to what part of his head, he stated "I had a cut or abrasion on my forehead, *I'm told*, so *I think* it was an upper part of my head it hit." (Vanzant Depo. Pg. 97 (emphasis added)).

Additionally, Dr. Pirnat concedes that he would have expected that an airbag deployed straight out into the chest with enough force to drive an individual's head backward would have left abrasions on the individual's face, chin, ears, lips or neck. (Pirnat Depo. Pg. 32). It is undisputed that the mid-mount airbag deploys straight out (or virtually straight out with a 12 degree upward movement) and that the only abrasions on Mr. Vanzant were those on his forehead. Dr. Pirnat further indicated he believed that the ER doctor noted a forehead abrasion specifically related to an airbag. (Id. at 33-34). However, the Court's review of the document (Doc. 49, Exhibit 4) notes only the abrasion without an indication of causation. Dr. Pirnat also testified that he knows nothing about the Dodge Ram airbag system, the force of the crash, or the position of Plaintiff prior to or during the crash. He even states that had the airbag not deployed, death was a real possibility and that Mr. Vanzant could likely have been killed in this accident. (Pirnat Depo. Pg. 31).

Dr. Allen also testified that he does not have any product design and analysis experience related to airbags and that he had never testified in case involving an automobile accident. (Allen Depo. Pgs. 11-12, 18). He also testified that he has never

seen a documented study where there has been somebody who has received a paralyzing injury from an airbag due to a focal contact to the forehead as allegedly occurred here. (Id. at 70). When asked if he had a representation of the position that Mr. Vanzant had to be in order to receive the injury he did, Dr. Allen stated that "[o]nly to the extent that his head, wherever his body position was at the time, would have had to have been close to a leading edge of the airbag. That's the only thing we can say about it, if the scenario that the airbag caused the abrasion is true." (Id. at 73-74).

Additionally, Mr. Vanzant testified that he only moved forward a matter of inches right at impact and that he felt hit by the airbag exactly at impact. (Id. at 96-97). When asked if he was moving forward like if he was braking moving forward, he responded, "No, I don't recall that that was the case." (Id. at 97). Based upon this testimony, Defendant performed another crash test with an unbelted passenger of like size to Mr. Vanzant. See Doc. 47, Exhibit 21.⁴ These deployment photographs show the airbag strike the dummy's lower torso first and in the pictures provided does not reach the dummy's forehead.

Plaintiffs also argue that Defendant's own employees help support Plaintiffs' claims. Guy Nusholtz, a Senior Manager for DaimlerChrysler, who devotes virtually all of his time to development and testing of airbag systems, testified that the crash tests performed involving unbelted passengers in front-end collisions at 30 and 35 mph do not show the

⁴The Defendant's further argue that a frontal crash test with a 1998 Dodge Ram shows that an unstrained driver in the 50th percentile, which is several inches shorter than Mr. Vanzant, strikes the windshield just below the headliner, hyperextending the dummy's head backwards in the precise manner in which Mr. Vanzant received his injury. See Doc. 47, Exhibit 22. However, this test shows an unrestrained driver and not a unrestrained passenger. Therefore, the test results at Exhibit 22 are not applicable here other than to show that the Defendant performed crash tests on an unstrained dummy.

dummy hitting the dashboard or windshield prior to contact with the airbag. (Nusholtz Depo. Pgs. 55-56). He went onto state that the dummy would not hit the dashboard or windshield at 50 mph either. (Id. at 57). Adelbert Timothy Czapp, another Senior Manager for DaimlerChrysler, agreed that pursuant to their crash test results, a deploying airbag can strike a passenger in the head and face area, depending on the location and movement of the passenger. (Czapp Depo. Pgs. 80-83). Thus, Plaintiffs conclude, Mr. Vanzant did not hit the dashboard or windshield, therefore, the airbag must have caused the injury. Defendant counters that Nusholtz testified that when a crash test dummy is positioned very close to the dashboard that the contact is just basically to the head but when the dummy is further back it contacts the dummy at the chest and head (Nusholtz Depo. Pg. 98) and that Czapp testified that the movement of the head as it strikes the airbag is forward and down, not back as alleged to have happened here, and that the head strikes the airbag not that the airbag strikes the head (Czapp Depo. Pg. 81-82).

As the Court views the facts in the light most favorable to Plaintiffs, the nonmoving parties, the Court would have found, based upon the conflicting evidence above, that there is a genuine issue of material fact in dispute that a jury must decide; however, as previously stated based upon the above rulings this issue is moot.

B. Negligence

Plaintiff's negligence claim requires proof of: (1) a duty to design against reasonably foreseeable hazards; (2) a breach of that duty; and (3) an injury that was proximately caused by the breach. See McConnell v. Cosco, Inc., 238 F. Supp.2d 970, 980 (S.D. Ohio 2003)(citing Briney v. Sears, Roebuck & Co., 782 F.2d 585, 587 (6th Cir. 1986)(applying Ohio law)). As previously stated, Mr. Bloch states that "airbags were designed and tested

to offer adequate protection in frontal collisions *for both the unbelted and belted drivers and passengers*." (Exhibit 52, Exhibit 1, Pg. 2). The Court takes judicial notice of the fact that car manufacturers have a duty to install airbags that meet stringent government standards⁵ and a duty to design them against reasonably foreseeable hazards. See 49 U.S.C. § 30127; 49 CFR § 571.208, S4.1.5.3 (1998). The test for determining whether a particular hazard is foreseeable, is "whether a reasonably prudent person would have anticipated that an injury was likely to result from the performance or nonperformance of an act." *Briney*, 782 F.2d at 588 *citing Menifee v. Ohio Welding Products, Inc.*, 15 Ohio St. 3d 75, 77, 472 N.E.2d 707 (1984). It is clear to this Court that a reasonably prudent person would anticipate that an serious injury is likely to result when riding in a vehicle during an accident without wearing a seatbelt. See Doc. 49, Exhibit 9, Admission number 11 and 12.

The question now before the Court is whether that duty breached. This issue was also not addressed in the briefs and based upon the limited record before this Court, there is no evidence that it was. Thus, summary judgment must be granted.

C. Breach of Implied Warranty

A breach of implied warranty claim is "virtually indistinguishable" from a design defect claim brought under the Ohio Products Liability Act. *Tompkin v. Phillip Morris USA, Inc.* 362 F. 3d 882, 902 (6th Cir. 2004). Thus, the breach of implied warranty claim will not be separately addressed in this Order.

D. Loss of Consortium and Punitive Damages

Based upon the above, these claims can not survive.

⁵Plaintiffs do not argue that the Defendant failed to meet those stringent government standards. Thus, the Court assumes that the standards were met.

IV. <u>CONCLUSION</u>

Based upon the foregoing, Defendant's motion for summary judgment is hereby GRANTED. The Clerk of Courts is directed to remove this case from the docket of this court.

IT IS SO ORDERED.

s/Michael R. Barrett Michael R. Barrett, Judge United States District Court We have introduced two Lagrange multipliers, R and D, in order to take into account two constraints. The first (associated to R) enforces the condition $G_N = \frac{\sqrt{\lambda_1} + \ldots + \sqrt{\lambda_N}}{N\sqrt{b}} = s\sqrt{N}$ or equivalently $\int_0^\infty \sqrt{x} \rho(x) dx = s\sqrt{b}$ (it replaces the delta function in the expression of $P\left(G_N = s\sqrt{N}\right)$). The second (associated to D) enforces the normalization of the density ρ : $\int_0^\infty \rho(x)dx = 1$. The functional integral (79) is carried out in the large N limit by the method of steepest descent. Hence:

$$P(G_N = s\sqrt{N}) \propto \exp\left[-N^2 E_s \left[\rho_c\right]\right] \tag{81}$$

where $\rho_c(x)$ minimizes the effective energy: $\frac{\delta E_s[\rho(x)]}{\delta \rho(x)} = 0$. The saddle point density $\rho_c(x)$ is thus given by the equation:

$$x + R\sqrt{x} + D = 2\int_0^\infty \rho_c(x') \ln|x - x'| dx'$$
 (82)

Differentiating once with respect to x leads to the integral equation:

$$1 + \frac{R}{2\sqrt{x}} = 2\mathcal{P} \int_0^\infty \frac{\rho_c(x')}{x - x'} dx' = 2H_x \left[\rho_c\right]$$
 (83)

 $H_x[\rho_c]$ is called the semi-infinite Hilbert transform of ρ_c (and \mathcal{P} denotes the principal value). It is not easy to invert it directly. However, the finite Hilbert transform $H_x^f[y] = \mathcal{P} \int_a^b \frac{y(t)}{t-x} dt$ can be inverted using a theorem proved by Tricomi [49]. According to Tricomi, the solution of the integral equation

$$f(x) = \mathcal{P} \int_{a}^{b} \frac{y(t)}{t - x} dt \text{ with } a < x < b, |a| + |b| < \infty$$
(84)

is given by

$$y(x) = \frac{1}{\pi^2 \sqrt{x - a}\sqrt{b - x}} \left[C_0 - \mathcal{P} \int_a^b \frac{\sqrt{t - a}\sqrt{b - t}}{t - x} f(t) dt \right] \quad \text{for } a < x < b$$
 (85)

where C_0 is an arbitrary constant. Tricomi showed that C_0 then satisfies: $\pi \int_a^b y(t)dt = C_0$. We will hereafter assume that the saddle point density ρ_c has a finite support and use Tricomi's result.

So, the steps we need to carry out are (i) to find the solution $\rho_c(x)$ of the integral equation (83) which will contain yet unknown Lagrange multipliers R and D (ii) fix R and D from the two conditions: $\int_0^\infty \rho_c(x) dx = 1$ and $\int_0^\infty \sqrt{x} \, \rho_c(x) \, dx = s\sqrt{b}$ for a fixed given s and (iii) evaluate the saddle point energy $E_s[\rho_c]$ which is then precisely (up to an additive constant) the large deviation function $\Phi(s)$ announced in Eq. (70).

Physically, as the effective (external) potential for the charges is of the form $V_f(x) = x + R\sqrt{x} + D$ (see equations (80) and (82)), we expect a different behavior of the charge density $\rho_c(x)$ depending on the sign of the Lagrange multiplier R.

- For R>0, the effective potential $V_f(x)=x+R\sqrt{x}+D$ is an increasing function of x for $x\geq 0$ with minimum at x = 0. In this case, the charges will be confined near the origin. Therefore the density must be large for small x, decreasing as x increases and finally vanishing at a certain x = L. We thus assume that $\rho_c(x)$ has a finite support over [0, L] where L is fixed by demanding that the density vanishes at x = L: $\rho_c(L) = 0$.
- However, for R < 0, the effective potential is minimal for $x = x_0 = \frac{R^2}{4} > 0$. The density must be larger around $x = x_0$. In that case, $\rho_c(x)$ will have a finite support over $[L_1, L_2]$ with $L_1 > 0$ and where L_1 and L_2 are fixed by the constraints $\rho_c(L_1) = 0 = \rho_c(L_2)$.

We will see later that R>0 corresponds to the left side of the mean of the center of mass $(s<\mu)$, and R<0corresponds to its right side $(s > \mu)$. Thus there is a phase transition in this Coulomb gas problem as one tunes s through $s = \mu$ or equivalently R through the critical value R = 0. The optimal charge density has different behaviors for R>0 and R<0. When expressed as a function of s, this leads to non-analytic behavior of the saddle point energy, i.e., the large deviation function $\Phi(s)$ at its minimum $s = \mu$.

1. Case
$$R \ge 0$$
 $(s \le \mu)$

Let us begin with the case $R \geq 0$, that will be shown to correspond to $s \leq \mu$ (left side of the mean of the center of mass). In this case, the effective potential is minimal for x=0. We can thus assume that ρ_c has a finite support over [0,L] where L is fixed by the constraint $\rho_c(L)=0$. In this subsection, we compute the saddle point density $\rho_c(x)$ and derive an exact closed form for the energy $E_s[\rho_c]$ (and thus the function $\Phi(s)$). From this explicit form, we work out the asymptotic behavior of $\Phi(s)$ for $s \to 0$ and for $s \to \mu^-$. For $s \to \mu^-$, we will see that the pdf can be approximated by a Gaussian -and this will give the mean and variance of the pdf of the center of mass.

The (normalized) solution $\rho_c(x)$, with support over]0, L], of the integral equation (83) can then be obtained using Tricomi's theorem in Eq. (85). The resulting integral can be performed using the Mathematica and we get

$$\rho_c(x) = \frac{1}{2\pi} \sqrt{\frac{L - x}{x}} + \frac{R}{2\pi^2 \sqrt{x}} \operatorname{argth}\left(\sqrt{1 - \frac{x}{L}}\right) \quad \text{for } 0 < x \le L$$
 (86)

where argth is the inverse hyperbolic tangent.

As the density $\rho_c(x)$ must be positive for all $x \in]0, L[$ (it is a density of states, of charges), such a solution (with support over]0,L]) can exist only for $R \geq 0$. For $R \neq 0$, we have indeed $\rho_c(x) \approx \frac{R}{4\pi^2} \frac{|\ln x|}{\sqrt{x}}$ as $x \to 0^+$. Therefore Rmust be positive: $R \ge 0$. Conversely, it is not difficult to see that for $R \ge 0$, the density given in Eq. (86) is positive for all $x \in]0, L[$. In this phase $(R \ge 0)$, as figure 7 shows, the Coulomb charges are confined close to the origin: the interfaces are bound to the substrate.

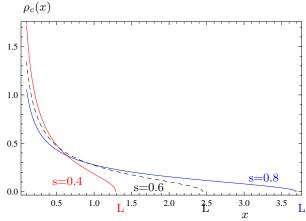


FIG. 7: Density of states $\rho_c(x)$ (density of charges) of the Coulomb gas associated to the computation of the pdf $P(G_N = s\sqrt{N})$ of the center of mass, in the case $s \le \mu = \frac{8}{3\pi\sqrt{b}}$ $(R \ge 0)$, plotted for different values of s (and for b = 1). The effective potential seen by the charges is minimal for x = 0, thus the density has a finite support over [0, L] and diverges at the origin.

- When s tends to $\mu \approx 0.85$ for b=1 (i.e. the center of mass tends to its mean value), L tends to 4 and ρ_c tends to the average value of the density of states $(R \to 0)$.
- When $s < \mu$ and s decreases (i.e. the center of mass is smaller than its mean and decreases), L < 4 and L decreases also: the Coulomb gas of charges is more and more compressed, the charges are more and more confined close to the origin.

We want to compute the pdf $P(G_N = s\sqrt{N})$. The basic variable is thus s. There are also three unknown parameters: R and D are two Lagrange multipliers and L is the upper bound of the density support. These parameters will be determined by enforcing the three constraints $\int_0^\infty \rho_c(x)dx = 1$, $\int_0^\infty \sqrt{x}\rho_c(x)dx = s\sqrt{b}$ and $\rho_c(L) = 0$. Hence, the parameters L and R are solutions of the two following equations:

$$\frac{L^{3/2}}{12\pi} + \frac{\sqrt{L}}{\pi} = s\sqrt{b} \text{ and } R = \frac{2\pi}{\sqrt{L}} - \frac{\pi\sqrt{L}}{2}$$
 (87)

These equations can be solved exactly. In particular, we obtain the following expression for L = L(s):

$$L(s) = \left(-g_1(s)^{1/3} 2^{1/3} + 2^{5/3} g_1(s)^{-1/3}\right)^2 \quad \text{with} \quad g_1(s) = -3\pi s \sqrt{b} + \sqrt{16 + 9b\pi^2 s^2}$$
 (88)

The saddle point energy can then be computed (from equation (80) and using (82) for the calculation of the Lagrange multiplier D) as a function of L = L(s):

$$E_s[\rho_c] = \frac{L(s)^2}{32} - \ln\left(\frac{L(s)}{4}\right) + 1 \tag{89}$$

Finally the distribution of the center of mass, in the large N limit, is simply given by the steepest descent method $P(G_N = s\sqrt{N}) \propto \exp\left[-N^2 E_s\left[\rho_c\right]\right]$:

$$P(G_N = \nu) \propto \exp\left[-N^2 \Phi\left(\frac{\nu}{\sqrt{N}}\right)\right] \quad \text{with} \quad \Phi(s) = \frac{L(s)^2}{32} - \ln\left(\frac{L(s)}{4}\right) - \frac{1}{2}$$
 (90)

with L=L(s) given in Eq. (88). The additive constant has been chosen for convenience such that the minimum of Φ is 0. Φ is thus a positive function. $\Phi(s)$ is plotted in Fig. 8. As expected, the minimum of $\Phi(s)$ is reached for $s=\mu$, where $G_N=\mu\sqrt{N}=\langle G_N\rangle$ -the average of the center of mass.

Validity of the regime where the density has a support over]0,L]: $R \ge 0$, $s \le \mu$

As we noticed above, the density ρ_c must be positive for every $0 < x \le L$, which is equivalent to demanding that $R \ge 0$. And from Eq. (87), one can easily show that the constraint $R \ge 0$ is equivalent to $\mathbf{s} \le \mu$. Thus the expression of $\Phi(s)$ given in Eq. (90) is only valid on the left side of the mean of the center of mass: $\nu \le \mu \sqrt{N}$ (or $s \le \mu$).

Limit $s \to \mu^-$ ($R \to 0^+$): Gaussian approximation of the pdf For $s \to \mu^-$, Φ can be expanded about its minimum:

$$\Phi(s) \approx \frac{(s-\mu)^2}{2\sigma^2} \text{ where } \mu = \frac{8}{3\pi\sqrt{b}} \text{ and } \sigma = \frac{1}{\pi}\sqrt{\frac{2}{b}}$$
(91)

In this limit, the pdf of the center of mass can be approximated by a Gaussian:

$$P(G_N = s\sqrt{N}) \propto e^{-\frac{N^2(s-\mu)^2}{2\sigma^2}} \text{ as } s \to \mu^-$$
(92)

For large N, only the vicinity of $s = \mu$, where Φ is minimum, will contribute. Therefore, the Gaussian approximation above gives the mean value of the center of mass and its variance:

$$\langle G_N \rangle = \langle h \rangle \approx \mu \sqrt{N} \approx \frac{8}{3\pi} \sqrt{\frac{N}{b}}$$
 (93)

$$\sqrt{\operatorname{Var}(G_N)} = \sqrt{\langle G_N^2 \rangle - \langle G_N \rangle^2} \approx \frac{\sigma}{\sqrt{N}} \approx \frac{1}{\pi} \sqrt{\frac{2}{N b}}$$
 (94)

This differs again strongly from the case of independent interfaces. For interfaces that are allowed to cross (they are thus completely independent), the average of the center of mass $\langle G_N \rangle = \langle h \rangle = m$ is of order one, and its variance is given by $\sqrt{\operatorname{Var}(G_N)} = \frac{\sigma_1}{\sqrt{N}}$, where m (resp. σ_1) is the mean (resp. variance) of one single interface (see section II A). Both m and σ_1 depend on α and b: they depend on the whole form of the potential $V(h) = \frac{b^2h^2}{2} + \frac{\alpha(\alpha-1)}{2h^2}$. But for nonintersecting interfaces, only the harmonic part of the potential (with frequency b) has a non-negligible effect for large N (the α -dependence drops out, as we explained at the beginning of the section). And the relative standard deviation $\frac{\sqrt{\operatorname{Var}(G_N)}}{\langle G_N \rangle}$ is of order $O\left(\frac{1}{\sqrt{N}}\right)$ for independent interfaces against $O\left(\frac{1}{N}\right)$ for nonintersecting interfaces. The relative fluctuations are strongly reduced by the fermionic repulsion.

Limit
$$s \to 0^+ (R \to +\infty)$$

For $s \to 0^+$, the upper bound L(s) of the density support tends to zero like s^2 : $L(s) \approx \pi^2 s^2 b + O(s^4)$ as $s \to 0^+$ and thus Φ tends to infinity:

$$\Phi(s) \approx -2\ln s - \frac{1}{2} - \ln\left(\frac{\pi^2 b}{4}\right) + O(s\ln s) \text{ as } s \to 0^+$$
(95)

The probability density function thus tends to zero as a power law:

$$P(G = s\sqrt{N}) \propto s^{2N^2} \text{ as } s \to 0^+ \tag{96}$$

To summarize, for $s \leq \mu = 8/(3\pi\sqrt{b})$, the large deviation function $\Phi(s) = \Phi^{-}(s)$ characterizing the form of the pdf of the center of mass G_N to the left of its mean value is given by Eqs. (90) and (88), and is plotted in Fig. 8.

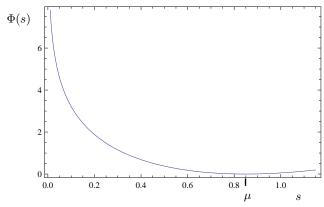


FIG. 8: Large deviation function $\Phi(s)$ of the pdf of the center of mass, such that $P(G_N = s\sqrt{N}) \propto e^{-N^2\Phi(s)}$. The minimum of $\Phi(s)$ occurs at $s = \mu = 8/\left(3\pi\sqrt{b}\right)$ which corresponds to the average value of the center of mass. We have chosen b=1 so that $\mu = 8/\left(3\pi\right) = 0.848826.$. The domain $s < \mu$ corresponds to R > 0 where the explicit form of $\Phi(s)$ is known (Eq. (90)). $\Phi(s)$ is a smooth function with a very weak non-analyticity at $s = \mu$ (essential singularity) -that can not be seen in a simple plot of $\Phi(s)$.

2. Case
$$R < 0$$
 $(s > \mu)$

The previous regime (density with support over]0, L]) is only valid for $R \ge 0$ or equivalently $s \le \mu$. When R < 0, the effective potential is indeed minimal for $x = x_0 = \frac{R^2}{4} > 0$: the density ρ_c is expected to have a finite support over $[L_1, L_2]$ with $L_1 > 0$. L_1 and L_2 are fixed by the constraints $\rho_c(L_1) = 0 = \rho_c(L_2)$.

In this subsection, we find an expression for ρ_c when R < 0 as a sum of elliptic integrals. We also derive the equations associated to the constraints $\rho_c(L_1) = 0 = \rho_c(L_2)$. But we could in general neither compute explicitly the constraint $\int \sqrt{x}\rho_c(x)dx = s\sqrt{b}$ nor find a closed form for the energy (and Φ), except for the asymptotic regimes $s \to +\infty$ and $s \to \mu^+$. For $s \to \mu^+$, we show that $\Phi(s)$ has a very weak non-analyticity -an essential singularity- at $s = \mu$:

$$\Phi^{+}(s) - \Phi^{-}(s) \approx -\pi \sqrt{b} (s - \mu) e^{-\frac{8}{\pi \sqrt{b} (s - \mu)}} e^{4(\ln 2 - 1)} \quad \text{as} \quad s \to \mu^{+} \quad \text{where} \quad \Phi(s) = \begin{cases} \Phi^{-}(s) & \text{for } s < \mu \\ \Phi^{+}(s) & \text{for } s > \mu \end{cases}$$
(97)

The (normalized) solution ρ_c , with support over $[L_1, L_2]$, of the integral equation (83) is again given by Tricomi's theorem. We get

$$\rho_c(x) = \frac{1}{\pi^2 \sqrt{x - L_1} \sqrt{L_2 - x}} \left[\pi + \frac{\pi}{4} (L_1 + L_2 - 2x) + \frac{R\sqrt{L_2 - L_1}}{4} J\left(\frac{L_1}{L_2 - L_1}, \frac{x - L_1}{L_2 - L_1}\right) \right]$$
(98)

with

$$J(\xi, y) = \mathcal{P} \int_{0}^{1} dt \frac{\sqrt{t}\sqrt{1-t}}{(t-y)\sqrt{t+\xi}}$$

$$= -2\sqrt{1+\xi} E\left(\frac{1}{1+\xi}\right) + \frac{2\xi\sqrt{1+\xi}}{\xi+y} K\left(\frac{1}{1+\xi}\right) - \frac{2\xi(1-y)}{(\xi+y)\sqrt{1+\xi}} \Pi\left(\frac{\xi+y}{y(1+\xi)}, \frac{1}{1+\xi}\right)$$
(99)

where K and E are the complete elliptic integrals of the first and second kind respectively; and Π is the incomplete elliptic integral of the third kind:

$$E(k) = \int_0^1 \sqrt{\frac{1 - kt^2}{1 - t^2}} dt \quad \text{and} \quad K(k) = \int_0^1 \sqrt{\frac{1}{(1 - kt^2)(1 - t^2)}} dt$$
 (100)

$$\Pi(n,m) = \mathcal{P} \int_0^1 \frac{1}{(1-nt^2)\sqrt{1-mt^2}\sqrt{1-t^2}} dt$$
(101)

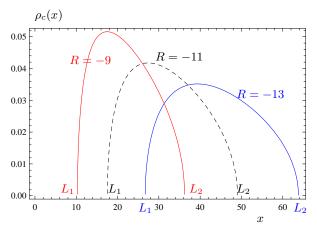


FIG. 9: Density of states $\rho_c(x)$ (density of charges) of the Coulomb gas associated to the computation of the pdf $P(G_N = s\sqrt{N})$ of the center of mass, in the case $s > \mu = \frac{8}{3\pi\sqrt{b}}$ (R < 0), plotted for different values of the Lagrange multiplier R, or equivalently different values of s (and for b = 1). The effective potential seen by the charges is minimal for $x = x_0 = \frac{R^2}{4} > 0$, thus the density has a finite support over $[L_1, L_2]$ and is maximal around $x = x_0$.

When $s > \mu$ and s increases (i.e. the center of mass is larger than its mean and increases), $L_2 > 4$, $L_1 > 0$ and L_2 and L_1 increase also: the charges form a bubble that gets further from the origin when R decreases (or s increases).

We want to compute the pdf $P(G_N=s\sqrt{N})$. The basic variable is thus s. There are now four unknown parameters: R and D are two Lagrange multipliers and L_1 and L_2 are the bounds of the density support. These parameters will be determined by enforcing the four constraints $\int_0^\infty \rho(x)dx=1$, $\int_0^\infty \sqrt{x}\rho(x)dx=s\sqrt{b}$, $\rho_c(L_1)=0$ and $\rho_c(L_2)=0$. For a given R (Lagrange multiplier), the parameters L_1 and L_2 are fixed by the constraints $\rho_c(L_1)=0=\rho_c(L_2)$:

$$\sqrt{L_2} = -\frac{R K(k)}{\pi} \quad \text{where } k = \frac{L_2 - L_1}{L_2} = 1 - \frac{L_1}{L_2}$$
and
$$\frac{2\pi^2}{R^2} = -K(k) \left(E(k) + \left(\frac{k}{2} - 1 \right) K(k) \right)$$
(102)

We have already taken account of the constraint $\int \rho_c(x)dx = 1$ (normalization) by setting the constant C_0 that appears in Tricomi's theorem (equation (85)) to $C_0 = \pi \int \rho_c(x)dx = \pi$.

The last constraint $\int \sqrt{x}\rho_c(x)dx = s\sqrt{b}$ gives R as a function of s. But the integral is in general difficult to calculate. And finally D is in principle given by the saddle point equation (see Eq. (82)) at a special value of x, for example $x = L_1$. But it is again difficult to compute in general.

Therefore we couldn't compute exactly the saddle point energy. But, thanks to the above formulas, we could plot the density for different values of k (or equivalently, different values of R or of s). In this phase (R < 0), as figure 9 shows, the Coulomb charges accumulate in a band near the minimum of the effective potential. They form a bubble that gets further from the origin when R decreases (or s increases). In this case, the interfaces are not bound to the substrate.

We could also derive the asymptotics of $\Phi(s)$ in this regime: $s \to +\infty$ and $s \to \mu^+$.

Right tail of the pdf: limit $s \to +\infty$ $(R \to -\infty)$

The limit $R \to -\infty$ or equivalently $s \to +\infty$ corresponds to $L_2 \to +\infty$ with $k = \frac{L_2 - L_1}{L_2} \to 0^+$. In this limit, we have

$$R \approx \sqrt{2} \left[-\frac{8}{k} + 4 + \frac{21}{32}k + O(k^2) \right] \text{ and } \begin{cases} L_2 \approx \frac{32}{k^2} - \frac{16}{k} - \frac{9}{4} + O(k) \\ L_1 \approx \frac{32}{k^2} - \frac{48}{k} + \frac{55}{4} + O(k) \end{cases} \text{ as } k = 1 - \frac{L_1}{L_2} \to 0^+$$
 (103)

And finally, for $k = 1 - \frac{L_1}{L_2} \to 0^+$ with $y = \frac{x - L_1}{L_2 - L_1}$ fixed, 0 < y < 1, we have:

$$\rho_c(x) \approx \frac{1}{4\pi} \sqrt{y(1-y)} \ k + O(k^2) \text{ with } y = \frac{x-L_1}{L_2 - L_1}$$
(104)

The constraint $\int \sqrt{x}\rho_c(x)dx = s\sqrt{b}$ gives $s \approx \frac{4}{k}\sqrt{\frac{2}{b}} + O(1)$ as $k \to 0^+$, and the minimal energy diverges:

$$E_s[\rho_c] \approx \frac{32}{k^2} + O(\frac{1}{k}) \text{ as } k \to 0^+ \text{ thus } \Phi(s) \approx s^2 b + O(s) \text{ as } s \to +\infty$$
 (105)

which corresponds to a Gaussian tail:

$$P(G_N = s\sqrt{N}) \propto e^{-bN^2s^2} \text{ as } s \to +\infty$$
 (106)

3. Non-analyticity of the pdf: limit $s \to \mu^+ \ (R \to 0^-)$

In this subsection, we analyse the limit $s \to \mu^+$, which corresponds to $R \to 0^-$. Let us define for convenience the following parameters:

$$\xi = \frac{L_1}{L_2 - L_1}$$
 $(\xi \to 0 \text{ as } s \to \mu^+)$ and $X = -\frac{\ln \xi}{4} + \ln 2$ $(X \to +\infty \text{ as } s \to \mu^+)$ (107)

In the following, ξ is chosen to be the small expansion parameter (for $s \to \mu^+$). We will see that the expansion terms are of order $O(X^{\eta}\xi^{\theta}) = O\left(|\ln \xi|^{\eta}\xi^{\theta}\right)$ with $\theta \geq 0$. As $X^{\eta}\xi^{\theta} \gg X^{\eta'}\xi^{\theta'}$ ($|\ln \xi|^{\eta}\xi^{\theta} \gg |\ln \xi|^{\eta'}\xi^{\theta'}$) for $0 \leq \theta < \theta'$ and for every η and η' , we can make an expansion in powers of ξ of the form $\sum_{\theta \geq 0} c_{\theta}(X)\xi^{\theta}$, where the exact value of the coefficients $c_{\theta}(X)$ can be computed as functions of X without expanding them. We thus keep all the orders of the expansion in X (expansion in $\ln \xi$).

We will show that the saddle point energy (and thus the pdf of the center of mass $P(G_N = s\sqrt{N})$) has a very weak (infinite-order) non-analyticity at $s = \mu$ (mean of the center of mass). More precisely, we will show that the difference of the energy on the right and left side of μ is of order $O\left(\frac{\xi}{X}\right) \approx O\left(|s - \mu| e^{-\frac{8}{\pi\sqrt{b}|s - \mu|}}\right)$: it is an essential singularity (it is much smaller than any power of $|s - \mu|$).

A singular limit for the saddle point density

Using the equations (102) obtained by enforcing the constraint $\rho_c(L_1) = 0 = \rho_c(L_2)$, we can expand the Lagrange multiplier R and the bounds L_1 and L_2 in terms of the small parameter $\xi = \frac{L_1}{L_2 - L_1}$, to first order in ξ :

$$R \approx \frac{-\pi}{\sqrt{X(X-1)}} + \xi \left(\frac{\pi \left(4X^2 + 2X - 1 \right)}{16 \left[X(X-1) \right]^{3/2}} \right) + O\left(\frac{\xi^2}{X} \right) \text{ and } \begin{cases} L_2 \approx \left(\frac{4X}{X-1} \right) + \xi \left(-\frac{(4X+1)}{2(X-1)^2} \right) + O(\xi^2) \\ L_1 \approx \xi \left(\frac{4X}{X-1} \right) + O(\xi^2) \end{cases}$$
(108)

with $\xi = \frac{L_1}{L_2 - L_1}$ and $X = -\frac{\ln \xi}{4} + \ln 2$.

For $s \to \mu^+$, we have $\xi \to 0$ $(X \to +\infty)$ and we recover $R \to 0$ (with R < 0), $L_2 \to 4$ and $L_1 \to 0$. These are the same limits as on the left side of μ : for $s \to \mu^-$, we have $R \to 0$ and the density has a support over]0, L] with $L \to 4$.

The saddle point density is given by Tricomi's theorem in equation (98). Using the constraint $\rho_c(L_1) = 0$, we get

$$\rho_c(x) = \rho(y) \equiv A\sqrt{\frac{y}{1-y}} + \frac{B}{\sqrt{y(1-y)}} + \frac{CJ(\xi, y)}{\sqrt{y(1-y)}} \quad \text{with } y = \frac{x - L_1}{L_2 - L_1} \ (0 \le y \le 1)$$
 (109)

where $J(\xi, y)$ can be expressed as the principal value of an integral (see equation (99)):

$$J(\xi, y) = \mathcal{P} \int_0^1 dt \frac{\sqrt{t}\sqrt{1-t}}{(t-y)\sqrt{t+\xi}}$$
(110)

and where the coefficients $A = -\frac{1}{2\pi}$, $B = \frac{-RJ(\xi,0)}{4\pi^2\sqrt{L_2-L_1}}$ and $C = \frac{R}{4\pi^2\sqrt{L_2-L_1}}$ can easily be expanded to first order in ξ .

For $y \in]0,1[$ fixed and for $\xi \to 0$ $(s \to \mu^+)$, we have

$$J(\xi, y) \approx -2 + 2\sqrt{1 - y} \operatorname{argth} \left(\sqrt{1 - y}\right) - \frac{\xi \ln \xi}{2y} + O(\xi) \quad \text{and} \quad L_1 \approx O(\xi) \quad \text{as } \xi \to 0$$
 (111)

Therefore, to zeroth order in ξ , the density shape (for $L_1 < x < L_2$) is the same as for $s < \mu$, it diverges for small x:

$$\rho_c(x) \approx \frac{1}{2\pi} \sqrt{\frac{L_2 - x}{x}} - \frac{1}{4\pi X} \sqrt{\frac{L_2}{x}} \operatorname{argth} \left(\sqrt{1 - \frac{x}{L_2}} \right) + O(\xi) \tag{112}$$

But (for $s > \mu$), the density $\rho_c(x)$ has a finite support over $[L_1, L_2]$ with $L_1 > 0$: it must vanish at $x = L_1$. The constraint $\rho_c(L_1) = 0$ seems to be violated in Eq. (112), but it is not. As $L_1 \approx O(\xi)$, the part of the density associated to small x (close to L_1) - and where the density must approach zero- does indeed not contribute to the zeroth order expansion of the density. The weight of the small range of values of x (around L_1) where the density grows from zero to a very large value just becomes negligible when $s \to \mu^+$.

The limiting shape of the density for $s \to \mu^+$ is thus singular. Therefore it is better not to expand $J(\xi, y)$ and the density for fixed y (fixed x) and small ξ , but to directly make an expansion of the energy, that involves integrals such that $\int dy J(\xi, y) \sqrt{y + \xi}$ or $\int dy J(\xi, y) \ln y$. Otherwise, as the limits $y \to 0$ and $\xi \to 0$ do not commute, the expansion of $J(\xi, y)$ in terms of powers of ξ will generate increasing negative powers of y that will make integrals like $\int dy J(\xi, y) \ln y$ diverge in zero.

Expansion of the constraint $\int dx \rho_c(x) \sqrt{x} = s\sqrt{b}$ for $s \to \mu^+$

We must enforce the constraint $\int_{L_1}^{L_2} dx \rho_c(x) \sqrt{x} = s\sqrt{b}$ that replaces the delta function $\delta\left(\frac{\sqrt{\lambda_1} + \dots + \sqrt{\lambda_N}}{N\sqrt{b}} - s\sqrt{N}\right)$ in the expresssion of the pdf of the center of mass $P(G_N = s\sqrt{N})$:

$$s\sqrt{b} = \int_{L_1}^{L_2} dx \rho_c(x) \sqrt{x} = (L_2 - L_1)^{3/2} \int_0^1 dy \rho(y) \sqrt{y + \xi}$$
 (113)

From the expression of ρ_c given in Eq. (109), we see that we need to expand for small ξ a double improper integral:

$$I(\xi) = \int_0^1 dy \frac{\sqrt{y+\xi} J(\xi, y)}{\sqrt{y(1-y)}} = \int_0^1 dy \frac{\sqrt{y+\xi}}{\sqrt{y(1-y)}} \mathcal{P} \int_0^1 dt \frac{\sqrt{t(1-t)}}{\sqrt{t+\xi}} \frac{1}{t-y}$$
(114)

As $I(\xi)$ is a double improper integral (with principal value), it is not easy to compute it or even expand it directly (for small ξ). Let us first make a simple transformation in order to get rid of the principal value:

$$I(\xi) = I(\xi = 0) + \xi f_0(\xi) \text{ with } f_0(\xi) = \int_0^1 dy \int_0^1 dt \, \frac{\sqrt{(1-t)}}{\sqrt{y(1-y)}} \, \frac{1}{\sqrt{t+\xi} \left[\sqrt{t(y+\xi)} + \sqrt{y(t+\xi)}\right]}$$
(115)

where $I(\xi=0)=-2$ (it can be easily computed exactly) and where f_0 is a definite double integral, easier to expand. However, as we already noticed, the limit $\xi \to 0$ and the integration do not commute: the expansion can not be done inside the integral. Hence, the method of expansion must be a bit more subtle. Our method (see appendix-B for details) consists in splitting the initial integral $f_0(\xi)$ in a sum of integrals (some of them are easier to compute, the other ones are shown to be negligible).

Finally (see appendix-B) we get the expansion of $I(\xi)$ to first order in ξ (but to all orders in X, or $\ln \xi$):

$$I(\xi) \approx -2 + \xi \left[8X^2 - 4X - 1 \right] + O(\xi^2 X^2)$$
 as $\xi \to 0$ (116)

Hence the constraint $\int dx \rho_c(x) \sqrt{x} = s\sqrt{b}$ is given by

$$s\sqrt{b} \approx \frac{2(4X-3)\sqrt{X}}{3\pi(X-1)^{3/2}} + \xi\left(\frac{-16X^3 + 12X^2 - 2X + 1}{8\pi(X-1)^{5/2}\sqrt{X}}\right) + O(\xi^2 X) \quad \text{as } \xi \to 0$$
 (117)

In particular, as expected, when $\xi \to 0^+$ $(X \to \infty)$, $s\sqrt{b}$ tends to the mean value $\mu\sqrt{b} = \frac{8}{3\pi}$.

Moreover, the formula above (Eq. (117)) can be inverted to express X and ξ as functions of $(s-\mu)$. As $\mu \sqrt{b} = \frac{8}{3\pi}$, we get:

$$X \approx \frac{2}{\pi (s-\mu)\sqrt{b}} + 1 + O((s-\mu)) \quad \text{and} \quad \xi \approx e^{\frac{-8}{\pi (s-\mu)\sqrt{b}}} e^{4(\ln 2 - 1)} \left(1 + O((s-\mu))\right) \quad \text{as} \quad s \to \mu^+$$
 (118)

Energy $E_s[\rho_c]$ and scaling function $\Phi(s) = E_s[\rho_c] - \frac{3}{2}$

From equation (80), we can compute the saddle point energy:

$$E_s[\rho_c] = \frac{1}{2} \int_{L_1}^{L_2} dx \, \rho_c(x) \, x - \frac{R}{2} \, s \sqrt{b} - \frac{D}{2}$$
 (119)

where the Lagrange multiplier D can be calculated by replacing x by L_1 in the saddle point equation for the density (equation (82)) and where $\int_{L_1}^{L_2} dx \, \rho_c(x) \, x$ is not very difficult to expand for $\xi \to 0$. Finally we get the expression of the energy for $s \to \mu^+$ ($\xi \to 0$), to first order in ξ and all orders in $X = \ln 2 - \frac{\ln \xi}{4}$:

$$E_s[\rho_c] \approx \ln\left(\frac{X-1}{X}\right) + \left(\frac{3X^2 - 4X + 2}{2(X-1)^2}\right) + \xi\left(\frac{-16X^3 + 16X^2 - 6X + 1}{8X(X-1)^3}\right) + O(\xi^2)$$
 (120)

Using equation (118) giving the expression of ξ as a funtion of $(s-\mu)$ in the limit $s \to \mu^+$, we will thus derive the behavior of the pdf of the center of mass $P(G_N = s\sqrt{N}) \propto e^{-N^2 E_s[\rho_c]}$ (for large N) for $s \to \mu^+$.

In order to show that the pdf of the center of mass has a non-analyticity at $s = \mu$, we must compare the expansion of the saddle point energy on the left side and the right side of the mean.

Zeroth order in ξ : $\Phi(s)$ seems to be a smooth function

Let us first consider the zeroth order in the expansion in terms of powers of ξ (on the right side of μ). To zeroth order in ξ , the constraint $\int dx \rho_c(x) \sqrt{x} = s\sqrt{b}$ given in Eq. (117) reduces to

$$s\sqrt{b} \approx \frac{2(4X-3)\sqrt{X}}{3\pi(X-1)^{3/2}} + O(\xi) \approx \frac{L_2^{3/2}}{12\pi} + \frac{L_2^{1/2}}{\pi} + O(\xi)$$
 (121)

Therefore, to all orders in $\ln \xi$ (or X -but to zeroth order in ξ), we recover the same equation as Eq. (87), i.e. the same equation as on the left side of the mean, giving L (L_2) as a function of s! The Lagrange multiplier R is also given, to zeroth order in ξ by the same function of L_2 (L) as on the left side of the mean (see Eq. (87)):

$$\frac{2\pi}{\sqrt{L_2}} - \frac{\pi\sqrt{L_2}}{2} \approx \frac{-\pi}{\sqrt{X(X-1)}} + O(\xi) \approx R + O(\xi)$$

$$\tag{122}$$

Finally, the energy, to zeroth order in ξ (but to all orders in X or $\ln \xi$) is given by the same expression as the energy on the left side of the mean:

$$E_{s}[\rho_{c}]^{+} \approx \ln\left(\frac{X-1}{X}\right) + \left(\frac{3X^{2}-4X+2}{2(X-1)^{2}}\right) + O\left(\frac{\xi}{X}\right)$$

$$\approx \frac{L_{2}^{2}}{32} - 2\ln\left(\frac{\sqrt{L_{2}}}{2}\right) + 1 + O\left(\frac{\xi}{X}\right)$$

$$\approx E_{s}[\rho_{c}]^{-} + O\left(\frac{\xi}{X}\right)$$
(123)

where $L_2 = L_2(s)$ is given by equation (121), the same equation for $s \to \mu^+$ to zeroth order in ξ as for $s \to \mu^-$. As $\xi \approx e^{\frac{-8}{\pi(s-\mu)\sqrt{b}}} e^{4(\ln 2 - 1)}$ when $s \to \mu^+$ (see equation (118)), we get:

$$\Phi^{+}(s) - \Phi^{-}(s) = E_{s}[\rho_{c}]^{+} - E_{s}[\rho_{c}]^{-} \approx O\left(\frac{\xi}{X}\right) \approx O\left(|s - \mu| e^{\frac{-s}{\pi |s - \mu| \sqrt{b}}}\right)$$
(124)

All the terms of the expansion of the energy (and thus $\Phi(s)$ and the pdf of the center of mass) in powers of $|s - \mu|$ (or $\frac{1}{\ln \xi}$ or $\frac{1}{X}$) are thus the same on the left and right side of the mean: $\Phi(s)$ is a smooth function, it is infinitely

differentiable even at $s = \mu$ -in particular the quadratic approximation of $\Phi(s)$ in Eq. (91) is valid on both left and right side of its minimum $(s = \mu)$. However, we will show that the expansion to first order in ξ (by keeping all the powers of X) gives a very weak non-analyticity of the energy (and thus $\Phi(s)$).

First order in ξ : non-analyticity of $\Phi(s)$

Using equation (120) and the remarks we made about the zeroth order expansion in ξ , we get the difference between the expansion of the energy on the right and left side of μ :

$$E_s[\rho_c]^+ - E_s[\rho_c]^- \approx \xi \left(\frac{-16X^3 + 16X^2 - 6X + 1}{8X(X - 1)^3} \right) + O(\xi^2)$$
 (125)

Using the expression of ξ and $X = \ln 2 - \frac{\ln \xi}{4}$ as function of s for $s \to \mu^+$ given in Eq. (118), we finally get

$$\Phi^{+}(s) - \Phi^{-}(s) = E_{s}[\rho_{c}]^{+} - E_{s}[\rho_{c}]^{-} \approx -\pi \sqrt{b} (s - \mu) e^{-\frac{8}{\pi \sqrt{b} (s - \mu)}} e^{4(\ln 2 - 1)} \text{ as } s \to \mu^{+}$$
(126)

This is an essential singularity. We have shown that the pdf of the center of mass $P(G_N = s\sqrt{N}) \propto e^{-N^2 E_s[\rho_c]}$ has a very weak non-analyticity at $s = \mu$: the energy (or equivalently $\Phi(s)$) has an infinite-order non-analyticity, of order $O\left(|s - \mu| e^{-\frac{8}{\pi \sqrt{b} |s - \mu|}}\right)$.

IV. CONCLUSION

In summary, we have studied a simple model of N nonintersecting fluctuating interfaces at thermal equilibrium and in presence of a wall that induces an external confining potential of the form $V(h) = \frac{b^2h^2}{2} + \frac{\alpha(\alpha-1)}{2h^2}$. Our study extablishes a deep connection between the statistics of heights of the interfaces in the limit of a large system $(L \to \infty)$ and the eigenvalues of the Wishart random matrix, thus providing a nice and simple physical realization of the Wishart ensemble. More precisely, we have proved that the joint probability distribution of the interface heights h_i in the limit of a large system can be mapped to the distribution of the eigenvalues λ_i of a Wishart matrix under the change of variables $b h_i^2 = \lambda_i$, with arbitrary parameter value M - N of the Wishart ensemble that is fixed by the parameter α of the inverse square external potential.

We have also shown how to exploit the relation between interfaces and eigenvalues of the Wishart matrix to derive asymptotically exact results for the height statistics in the interface model. In particular, we have seen that the nonintersecting constraint, the only interaction between interfaces in our model, drastically changes the behavior of interfaces: they become strongly correlated. Despite the presence of strong correlations that make the problem difficult to analyse, we were able to compute a number of asymptotic (large N) results exactly. These include the computation of the average density of states, the distribution of maximal and minimal heights and the distribution of the center of mass of the interfaces. In the last case, we have shown that the distribution has an extraordinarily weak singularity near its peak (an essential singularity) and this non-analytical behavior was shown to be a direct consequence of a phase transition in the associated Coulomb gas problem.

Finally, we expect that the appearence of the Wishart random matrix in a physically realizable example as shown in this paper will be useful in other contexts. In addition, the Coulomb gas technique used here seems to be a very nice way to derive exact asymptotic results in this class of interacting many body systems where exact analytical results are hard to come by. It would be interesting to use the analogy with a Coulomb gas in other physical problems related to Wishart matrices, for example to compute the distribution of entropy of a bipartite quantum system (see [46, 47]).

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APPENDIX A: COMPUTATION OF THE MOMENTS OF THE MINIMAL HEIGHT

(60) gives an exact expression for the pdf of the minimal height (lowest interface):

$$P(h_{\min} = t, N) = 2b^2t^3e^{-bNt^2}\mathcal{L}_{N-1}^{(2)}(-bt^2) = b^2t^3e^{-bNt^2}N(N+1){}_1F_1(1-N, 3, -bt^2)$$
(A1)

(see (14) for the relation between Laguerre polynomials and hypergeometric functions)

Therefore we can compute explicitely the moments of the minimal height:

$$\langle h_{\min}^k \rangle = \int_0^\infty dt \, t^k \, P\left(h_{\min} = t, N\right) = b^2 \, N(N+1) \, \int_0^\infty dt \, t^{k+3} \, e^{-bNt^2} \, {}_1F_1(1-N, 3, -bt^2) \tag{A2}$$

$$= b^{2} N(N+1) \frac{b^{-k/2-2}}{2} \int_{0}^{\infty} du \, u^{k/2+1} \, e^{-Nu} \, {}_{1}F_{1}(1-N,3,-u)$$
(A3)

with $bt^2 = u$. The integral above can be computed: $\int_0^\infty du \, u^{d-1} \, e^{-cu} \, _1F_1(a,b,-u) = c^{-d} \, \Gamma(d) \, _2F_1(a,d;b;-1/c)$ Therefore

$$\langle h_{\min}^k \rangle = \frac{\Gamma(k/2+2)}{2b^{k/2}} \frac{(N+1)}{N^{k/2+1}} {}_{2}F_{1}(1-N,k/2+2;3;-1/N)$$
 (A4)

For example, for k = 1, we find:

$$\langle h_{\min} \rangle = \frac{\Gamma(5/2)}{2b^{1/2}} \frac{(N+1)}{N^{3/2}} {}_{2}F_{1}(1-N,5/2;3;-1/N)$$
 (A5)

For large N, as ${}_2F_1(1-N,5/2;3;-1/N) = \sum_n \frac{(5/2)(7/2)...(3/2+n)}{(3)(4)...(n+2) n!} \frac{(1-N)(2-N)...(n-N)}{(-N)^n}$, we find:

$$\lim_{N \to \infty} {}_{2}F_{1}(1 - N, 5/2; 3; -1/N) = \sum_{n} \frac{(5/2)(7/2)...(3/2 + n)}{(3)(4)...(n + 2) n!}$$
$$= {}_{1}F_{1}(5/2; 3; 1) = \frac{4\sqrt{e}}{3}I_{0}(1/2)$$

Hence, for large N:

$$\langle h_{\min} \rangle \approx \frac{c_1}{\sqrt{h N}}$$
 (A6)

with

$$c_1 = \frac{\Gamma(5/2)}{2} \frac{4\sqrt{e}}{3} I_0(1/2) = \sqrt{\frac{\pi e}{4}} I_0(1/2) \approx 1.5538$$
 (A7)

APPENDIX B: NON-ANALYTICITY OF THE PDF OF THE CENTER OF MASS: EXPANSION OF $I(\xi)$

Let us expand for $\xi \to 0$ the integral $I(\xi)$ given in Eq. (114):

$$I(\xi) = \int_0^1 dy \frac{\sqrt{y+\xi} J(\xi, y)}{\sqrt{y(1-y)}}$$
 (B1)

As $I(\xi)$ is a double improper integral (with principal value), it is not easy to compute it or even expand it directly (for small ξ). Let us first make a simple transformation in order to get rid of the principal value:

$$I(\xi) = \int_{0}^{1} dy \frac{\sqrt{y+\xi}}{\sqrt{y(1-y)}} \mathcal{P} \int_{0}^{1} dt \frac{\sqrt{t(1-t)}}{\sqrt{t+\xi}} \frac{1}{t-y}$$

$$= I(\xi=0) + \int_{0}^{1} dy \mathcal{P} \int_{0}^{1} dt \frac{\sqrt{t(1-t)}}{\sqrt{y(1-y)}} \frac{1}{t-y} \left(\sqrt{\frac{y+\xi}{t+\xi}} - \sqrt{\frac{y}{t}}\right)$$

$$= -2 + \xi \int_{0}^{1} dy \int_{0}^{1} dt \frac{\sqrt{(1-t)}}{\sqrt{y(1-y)}} \frac{1}{\sqrt{t+\xi} \left[\sqrt{t(y+\xi)} + \sqrt{y(t+\xi)}\right]}$$

$$\equiv -2 + \xi f_{0}(\xi)$$
(B2)

The value of $I(\xi = 0)$ can indeed be computed exactly:

$$I(\xi = 0) = \int_0^1 dy \frac{1}{\sqrt{1 - y}} \mathcal{P} \int_0^1 dt \, \frac{\sqrt{1 - t}}{t - y} = \int_0^1 \frac{dy}{\sqrt{1 - y}} \left[-2 + 2\sqrt{1 - y} \, \operatorname{argth} \left(\sqrt{1 - y} \right) \right] = -2 \tag{B3}$$

 f_0 is a definite double integral, easier to expand:

$$f_0(\xi) = \int_0^1 dy \, \int_0^1 dt \, \frac{\sqrt{(1-t)}}{\sqrt{y(1-y)}} \, \frac{1}{\sqrt{t+\xi} \left[\sqrt{t(y+\xi)} + \sqrt{y(t+\xi)} \right]}$$
(B4)

We thus need to expand a definite double integral $f_0(\xi)$ (we have got rid of the principal value).

However, as we already noticed, the limit $\xi \to 0$ and the integration do not commute: the expansion can not be done inside the integral.

Let us thus consider separately the integration over $]0,\xi]$ and $[\xi,1]$ (for the variable y):

$$f_0(\xi) = f_1(\xi) + f_2(\xi) \tag{B5}$$

where f_1 and f_2 are definite double integrals (no principal value):

$$f_1(\xi) = \int_0^{\xi} dy \int_0^1 dt \, \frac{\sqrt{(1-t)}}{\sqrt{y(1-y)}} \, \frac{1}{\sqrt{t+\xi} \left[\sqrt{t(y+\xi)} + \sqrt{y(t+\xi)} \right]}$$
 (B6)

$$f_2(\xi) = \int_{\xi}^{1} dy \int_{0}^{1} dt \frac{\sqrt{(1-t)}}{\sqrt{y(1-y)}} \frac{1}{\sqrt{t+\xi} \left[\sqrt{t(y+\xi)} + \sqrt{y(t+\xi)} \right]}$$
(B7)

The method of expansion will be the following. We will write f_1 (resp. f_2) as a sum of two integrals: the first will be chosen of the same order of f_1 (resp. f_2) for small ξ , but easier to compute (by separation of the variables t and y for example); the second will be much smaller than the first and than f_1 (resp. f_2). Then, following the same scheme, each of these two integrals can again be split into two pieces, until we get the full expansion to first order in ξ (the last integral will be shown to be much smaller than the other and will be neglected).

Let us first make the change of variable $y = \xi u$ in $f_1(\xi)$:

$$f_1(\xi) = \int_0^1 du \int_0^1 dt \frac{\sqrt{1-t}}{\sqrt{u}\sqrt{1-\xi u}\sqrt{t+\xi}} \frac{1}{\left(\sqrt{t(1+u)} + \sqrt{u(t+\xi)}\right)}$$
(B8)

Then we have

$$f_1(\xi) = f_1^a(\xi) + f_1^b(\xi) \tag{B9}$$

with f_1^a a product of two integrals (separation of variables)

$$f_1^a(\xi) = \left(\int_0^1 \frac{du}{\sqrt{u}\left(\sqrt{u} + \sqrt{1+u}\right)\sqrt{1-\xi u}}\right) \left(\int_0^1 dt \frac{\sqrt{1-t}}{\sqrt{t}\sqrt{t+\xi}}\right)$$

$$\approx \left(\int_0^1 \frac{du}{\sqrt{u}\left(\sqrt{u} + \sqrt{1+u}\right)} + O(\xi)\right) \left(\int_0^1 dt \frac{\sqrt{1-t}}{\sqrt{t}\sqrt{t+\xi}}\right)$$

$$\approx \left(-1 + \sqrt{2} + \operatorname{argsh} 1 + O(\xi)\right) \left(-\ln \xi + 4\ln 2 - 2 + O(\xi \ln \xi)\right)$$

$$\approx \ln \xi \left(1 - \sqrt{2} - \operatorname{argsh} 1\right) + (4\ln 2 - 2)(-1 + \sqrt{2} + \operatorname{argsh} 1) + O(\xi \ln \xi)$$
(B10)

and $f_1^b = f_1 - f_1^a$ (expected to be much smaller than f_1) is given by:

$$f_{1}^{b}(\xi) = \int_{0}^{1} du \int_{0}^{1} dt \frac{\sqrt{1-t}}{\sqrt{u}\sqrt{1-\xi u}\sqrt{t+\xi}} \left[\frac{1}{\left(\sqrt{t(1+u)} + \sqrt{u(t+\xi)}\right)} - \frac{1}{\sqrt{t}\left(\sqrt{u} + \sqrt{1+u}\right)} \right]$$

$$= -\xi \int_{0}^{1} \frac{du}{\sqrt{1-\xi u}\left(\sqrt{u} + \sqrt{1+u}\right)} \int_{0}^{1} dt \frac{\sqrt{1-t}}{\sqrt{t(t+\xi)}\left(\sqrt{t} + \sqrt{t+\xi}\right)\left(\sqrt{t(1+u)} + \sqrt{u(t+\xi)}\right)}$$

$$= f_{1}^{c}(\xi) + f_{1}^{d}(\xi)$$
(B11)

with

$$\begin{split} f_1^c(\xi) &= -\xi \int_0^1 \frac{du}{\sqrt{1 - \xi u} \left(\sqrt{u} + \sqrt{1 + u} \right)} \int_0^1 dt \frac{\sqrt{1 - t}}{\sqrt{t(t + \xi)} \left(\sqrt{t} + \sqrt{t + \xi} \right) \left(\sqrt{u} + \sqrt{1 + u} \right) \sqrt{t + \xi}} \\ &= -\left(\int_0^1 \frac{du}{\sqrt{1 - \xi u} \left(\sqrt{u} + \sqrt{1 + u} \right)^2} \right) \left(\int_0^{1/\xi} dz \frac{\sqrt{1 - \xi z}}{(1 + z)\sqrt{z}(\sqrt{z} + \sqrt{1 + z})} \right) \\ &\approx -\left(\int_0^1 \frac{du}{\sqrt{u} \left(\sqrt{u} + \sqrt{1 + u} \right)^2} + O(\xi) \right) \left(\int_0^\infty \frac{dz}{(1 + z)\sqrt{z}(\sqrt{z} + \sqrt{1 + z})} + O(\xi \ln \xi) \right) \\ &\approx \left(\frac{3}{\sqrt{2}} - 2 - \frac{\operatorname{argsh} 1}{2} + O(\xi) \right) \left(2 \ln 2 + O(\xi \ln \xi) \right) \\ &\approx \ln 2 \left(3\sqrt{2} - 4 - \operatorname{argsh} 1 \right) + O(\xi \ln \xi) \end{split} \tag{B12}$$

where we have made the change of variables $t = \xi z$; and

$$f_1^d(\xi) = -\xi^2 \int_0^1 \frac{du\sqrt{1+u}}{\sqrt{1-\xi u}(\sqrt{u}+\sqrt{1+u})^2} \int_0^1 \frac{dt\sqrt{1-t}}{\sqrt{t}(t+\xi)(\sqrt{t}+\sqrt{t+\xi})^2} \left(\sqrt{u(t+\xi)}+\sqrt{t(1+u)}\right)$$

$$\approx -\int_0^1 du \int_0^\infty dz \frac{\sqrt{1+u}}{(\sqrt{u}+\sqrt{1+u})^2} \frac{1}{\sqrt{z}(1+z)(\sqrt{z}+\sqrt{1+z})^2} \left(\sqrt{u(1+z)}+\sqrt{z(1+u)}\right)$$

$$+O(\xi)$$

$$\approx \operatorname{argsh} 1 \left(\ln 2 - 3\right) + \sqrt{2} \left(1 - 3\ln 2\right) - 1 + 6\ln 2 + O(\xi) \tag{B13}$$

Thus we have, for $\xi \to 0$

$$f_1(\xi) \approx \ln \xi \left(1 - \sqrt{2} - \operatorname{argsh} 1\right) \\ + \left(1 - \sqrt{2} + \operatorname{argsh} 1 \left(4 \ln 2 - 5\right) \\ + \ln 2 \left(4 \sqrt{2} - 2\right)\right) \\ + O\left(\xi \ln \xi\right) \tag{B14}$$

The same method of expansion aplied to f_2 gives

$$f_2(\xi) = f_3(\xi) + f_4(\xi)$$
 (B15)

with

$$f_{3}(\xi) = \int_{\xi}^{1} \frac{dy}{y\sqrt{1-y}} \int_{0}^{1} dt \frac{\sqrt{(1-t)}}{\sqrt{t+\xi} (\sqrt{t}+\sqrt{t+\xi})}$$

$$\approx \frac{(\ln \xi)^{2}}{2} + \ln \xi \left(\frac{3}{2} - 3\ln 2\right) + 2\ln 2\left(2\ln 2 - \frac{3}{2}\right) + O\left(\xi(\ln \xi)^{2}\right)$$
(B16)

and

$$f_{4}(\xi) = -\xi \int_{\xi}^{1} \frac{dy}{y\sqrt{1-y}\left(\sqrt{y}+\sqrt{y+\xi}\right)} \int_{0}^{1} dt \frac{\sqrt{t(1-t)}}{\sqrt{t+\xi}\left(\sqrt{t}+\sqrt{t+\xi}\right)\left(\sqrt{t(y+\xi)}+\sqrt{y(t+\xi)}\right)}$$

$$\approx \left(-\frac{3}{2}-\ln 2+\sqrt{2}+\operatorname{argsh} 1\right) \ln \xi$$

$$+\left((5-4\ln 2)\operatorname{argsh} 1+4(\ln 2)^{2}+\ln 2\left(1-4\sqrt{2}\right)-2+\sqrt{2}\right)+O(\xi(\ln \xi)^{2}) \tag{B17}$$

(for the expansion of f_4 , the same method of splitting has again been applied) Hence

$$f_2(\xi) = f_3(\xi) + f_4(\xi) \approx \frac{(\ln \xi)^2}{2} + \ln \xi \left(\sqrt{2} + \operatorname{argsh} 1 - 4 \ln 2\right) + \left((5 - 4 \ln 2) \operatorname{argsh} 1 + 8(\ln 2)^2 + \ln 2 \left(-2 - 4\sqrt{2}\right) - 2 + \sqrt{2}\right) + O(\xi(\ln \xi)^2)$$
(B18)

and, as $I(\xi) = -2 + \xi \left(f_1(\xi) + f_2(\xi) \right)$, we get (with $X = \ln 2 - \frac{\ln \xi}{4}$)

$$I(\xi) = -2 + \xi \left[\frac{(\ln \xi)^2}{2} + \ln \xi (1 - 4 \ln 2) + (8(\ln 2)^2 - 4 \ln 2 - 1) \right] + O(\xi^2 (\ln \xi)^2)$$

$$= -2 + \xi \left[8X^2 - 4X - 1 \right] + O(\xi^2 X^2)$$
(B19)

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